

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MAERSK, INC., and A.P. MOLLER-MAERSK, A/S

:
Plaintiffs,

:
-against-

: 05 CIV 4356 (CM)

NEEWRA, INC, REDNIHOM, INC., AREF HASSAN ABUL
INC., ARWEEN SINGH SAHNI a/k/a ARWEEN SAHNI :
SINGH, a/k/a ARWEEN SAHNI a/k/a ARWEEN SINGH a/k/a
ABUL SABAH a/k/a AREF HASSAN ABUL, MOHINDER :
SINGH SAHNI a/k/a MOHINDER SAHNI SINGH a/k/a :
MOHINDER SAHNI a/k/a MOHINDER SINGH a/k/a :
MOHINDER SINGH SAHANI a/k/a MOHINDER SAHANI :
a/k/a MOHINDER SAHANI SINGH, a/k/a JOGINDER SINGH :
SAHNI, JOGINDER SINGH SAHNI, a/k/a JOGINGER SINGH :
SAHNI a/k/a JOGINDER SAHNI SINGH a/k/a JOGINGER :
SAHNI SINGH a/k/a JOGINDER SINGH a/k/a JOGINDER :
SAHNI a/k/a JOGINGER SINGH a/k/a JOGINGER SAHNI, :
SABHARWAL CHANDRA KUMAR a/k/a SABHARWAL K.
CHANDRA, MANDEEP SINGH SAHNI a/k/a MOHINDER :
SINGH a/k/a MOHINDER SAHNI a/k/a MOHINDER SINGH :
SAHANI, HELP LINE COLLECTION CO. W.L.L., PARKER :
DAWOOD TAJUDDIN TAJUDIS ISMAIL PARKER,
SARDAR TRADERS EST., SARDAR INTERNATIONAL :
TRADING CO., AL TAMASOK AL ARABI EST., JOHN DOE :
1-100 (fictitious) and JOHN DOE INC.1-100 (fictitious) :

Defendants. :
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PLEASE TAKE NOTICE that upon defendants' Statement Pursuant to Rule 56.1
of the Local Civil Rules of this Court, dated March 30, 2009, and upon the Declaration of
Harry H. Wise, III, Esq., dated March 30, 2009, and the exhibits annexed thereto,
defendants Joginder Singh Sahni (sued herein as "Joginder Singh Sahni a/k/a Joginger
Singh Sahni a/k/a Joginder Sahni Singh a/k/a Joginder Singh a/k/a Joginder Sahni a/k/a
Joginger Singh a/k/a Joginger Sahni"), Dawood Tajuddin Parkar (sued herein as "Parker

Dawood Tajuddin Tajudis Ismail Parker"), and Help Line Collection Co. hereby move, pursuant to Rule 56 of the Federal Rules of Civil Procedure, for summary judgment dismissing this action, as against them, on the grounds that plaintiffs have no evidence that these defendants participated in any conspiracy to defraud or that they did anything else that would render them liable to plaintiffs, or, alternatively, for dismissal on the grounds that this Court lacks personal jurisdiction over these defendants.

Dated: New York, N.Y.
March 30, 2009



HARRY H. WISE, III (HW6841)
Attorney for Defendants Joginder Singh Sahni, Dawood Tajuddin Parkar, Help Line Collection Co. Sardar Traders Est., and Sardar International Trading Co., W.L.L.
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